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From: Commanding Officer, Navy Environmental Health Center  
To: Commanding Officer, NAVFAC Engineering Field Division, Atlantic, Naval  
Facilities Engineering Command, (Daniel Hood), 6506 Hampton Blvd,  
Norfolk, VA 23508

Subj: REVIEW COMMENTS OF DRAFT SITE 88, BUILDING 25 ACTION  
MEMORANDUM, OPERABLE UNIT NO.15, MARINE CORPS BASE,  
CAMP LEJEUNE, NC

Ref: (a) CH2M HILL ltr 180555.EC.AM of 23 Nov 04

Encl: (1) Subject Review

1. Per reference (a), we have completed a review of the subject document and forward our comments to you as enclosure (1).
2. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Mr. Kenneth Gene Astley at (757) 953-0937 or Ms. Vera Wang at (757) 953-0940. The DSN prefix is 377. The e-mail addresses are: [astleyg@nehc.mcd.navy.mil](mailto:astleyg@nehc.mcd.navy.mil) or [wangv@nehc.med.navy.mil](mailto:wangv@nehc.med.navy.mil).

  
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By direction

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**REVIEW COMMENTS  
DRAFT SITE 88 BUILDING 25  
ACTION MEMORANDUM  
OPERABLE UNIT NO. 15  
MARINE CORPS BASE  
CAMP LEJEUNE, NORTH CAROLINA  
NOVEMBER 2004**

Ref: (a) EPA Superfund Removal Procedures "Action Memorandum Guidance,"  
OSWER Directive 9360.3-01, Sep 1990  
(b) Naval Facilities Engineering Command, "U.S. Navy Human Health Risk  
Assessment Guidance," Dec 2001

**General Comments:**

1. Due to significant soil and groundwater contamination at this site, it seems obvious that there is a threat to human health and therefore a removal action is warranted. Since it is stated in ref. (a) that "*The Action Memo is the critical component of the administrative record because it is the primary decision document for a removal response [21].*" The adequacy of Action Memo as part of the Administrative Record must be ensured, in the event the decision is challenged. Also it must be ensured to facilitate public participation, regarding consideration of the factors affecting the removal action decision.
2. The risk at the site is from the DNAPL contaminating the groundwater. Although groundwater is not being remediated, groundwater contamination will not continue after DNAPL is removed. Hence, one of the objectives for removing DNAPL is to reduce the potential for contaminant mass flux from the source zone to groundwater. However, the Action Memo does not describe the mechanism for the past, present, or future release, observable or probable migration route(s) of contaminants, and does not identify the substances of concern, realistic exposure scenarios explaining how the water supply is threatened, and the immediacy and gravity of the threat. As indicated in ref. (a), the Memo should discuss these items, and site features or characteristics, weather conditions, human events, or other conditions that would either cause, spread, or accelerate the release of materials. Therefore, the Memo should expand on Section (III) Threats to Public Health, Welfare or the Environment, and the Statutory and Regulatory Authorities, and, Section (IV) Endangerment Determination, to include the information required by ref. (a).
3. The Action Memo should also expand on section (V)A.2 Contribution to Remedial Performance to include the requirements of ref. (a) which states that an Action Memorandum should address "*How far should the removal go to ensure that threats are adequately abated? For proposed or final NPL [National Priority List] sites, where*

*remedial action is planned or likely, explain (1) which threats must be abated entirely and which must be stabilized to protect public health, welfare, and the environment until a permanent remedy can be effected and (2) how abatement or stabilization is accomplished by the proposed actions in section V of the Action Memo.”*

4. Section (V)A.3, Description of Alternative Technologies, describes how the alternatives were assessed for treating the DNAPL plume at Site 88 and how they were compared for effectiveness, implementability and cost. However, the Memo does not address timely response and protection of human health and the environment. Although this may be somewhat explained in the Final EE/CA for Building 25 Site 88 at MCB Camp Lejeune, the Memo should expand on Section (V)A.3 to also include how the remedial alternatives were compared for timely response and protection of human health and the environment.